THE LAW OFFICES OF GLENN R. SNYDER

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ATTORNEYS FOR LARRY REYNOLDS

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

In re:	§	Chapter 11
	§	
MANSFIELD BOAT AND RV	§	
STORAGE, LLC	§	Case No. 18-33926
	§	
Debtor,	§	

LARRY REYNOLD'S MOTION FO MOTION FOR REHEARING ON ORDER FINDING LARRY IRRENDARSNO ON OROON TENDING ILAGRIKT

Larry Reynolds file this his MOTION FOR REHEARING ON ORDER FINDING LARRY REYNOLDS IN CIVIL CONTEMPT OF COURT and in support thereof would show the Court as follows:

This Motion for rehearing should be GRANTED because:

- 1. Larry Reynolds did not receive adequate notice of the Motion and hearing.
- 2. Service on Larry Reynolds of the Motion and hearing was not proper.
- 3. There was no evidence to support the finding of the Court hold Larry Reynolds in contempt.
- 4. The Court could not draw an adverse inference from Mr. Reynold's assertion of his fifth amendment privilege. Movant, Pender Capital Asset Based Lending Fund I, LP ("Pender") offered no other evidence.

- 5. Larry Reynolds was not required to was not required to proffer evidence to refute Pender Capital Asset Based Lending Fund I, LP's allegations. The burden of prof was entirely on the Pender.
- 6. Because the Court erred in holding Mr. Reynolds in contempt, the portions of the Order Regarding Motion for Order Finding Larry Reynolds In Civil Contempt Of Court entered on July 15, 2019 which order Larry Reynolds to take certain actions (pages 2 and 3 of the Order) are void and unenforceable
- 7. At the hearing on July 1, 2019 the Court did not find Mr. Reynolds in Contempt of Court.
- 8. At the hearing on July 1, 2019 the court did not make the finding set forth in the Order Regarding Motion for Order Finding Larry Reynolds In Civil Contempt Of Court set forth in the Order at page 2 paragraph 3.

WHEREFORE, PREMISSES CONSIDERED, for the reasons stated herein Larry
Reynolds requests the court GRANT his MOTION FOR REHEARING ON ORDER
FINDING LARRY REYNOLDS IN CIVIL CONTEMPT OF COURT be in all things
GRANTED and the findings and orders made in the Order Regarding Motion for Order Finding
Larry Reynolds In Civil Contempt Of Court be set aside and an new hearing GRANTED.

Respectfully submitted,

By: <u>/s/ Glenn R. Snyder</u>
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